

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
McALLEN DIVISION**

<b>UNITED STATES OF AMERICA</b>	§	
	§	
<b>v.</b>	§	<b>Criminal No. M-18-CR-1691</b>
	§	
<b>VIOLA ELIZABETH GARCIA, et. al.</b>	§	

**GOVERNMENT'S OFFER OF TRIAL EXHIBITS  
AND REQUEST FOR AUTHENTICATION PURSUANT TO LOCAL RULE CrLR 55.2**

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW the United States of America, by and through Ryan K. Patrick, United States Attorney in and for the Southern District of Texas, and Roberto Lopez, Jr., Assistant United States Attorney, and files this offer of trial exhibits pursuant to local rule CrLR 55.2.

I.

CrLR 55.2 provides in pertinent part:

**Authentication of Exhibits.** A party requiring authentication of an exhibit must notify the offering party in writing within seven days after the exhibit is listed and made available. Failure to object in advance of trial in writing concedes authenticity.

**Objections to Exhibits.** Objections to admissibility of exhibits must be made at least seven days before trial by notifying the Court in writing of the disputes, with copies of the disputed exhibit and authority.

II.

The Government intends to introduce, among other things, the following exhibits, that is, business records, during its case-in-chief or rebuttal:

1. A receipt and surveillance footage from Turner's Outdoorsman in Oxnard, California on August 28, 2018.

2. A receipt and surveillance footage from a .99 Cent Only Store in Oxnard, California on August 28, 2018
3. A receipt and surveillance footage from a McDonald's on August 29, 2018
4. A receipt and tickets for Greyhound Lines, Inc. reservation number 88864682 for Ronaldo and Eloiza Gallegos departing McAllen on August 31, 2018 with arrival in Los Angeles, California on September 2, 2018.
5. A Dollar Rent a Car Rental Agreement bearing Rental Agreement Number U23696956 relating to a car rented by Ida Andrade on or about August 28, 2018.
6. Instagram records for Instagram user ChrisAndrade805
7. Green Dot Bank records obtained by FBI on or about November 21, 2018 pursuant to a subpoena
8. Jail calls made by Viola Garcia while in custody at the Hidalgo County Detention Center
9. Jail calls made by Christopher Andrade and Ronaldo Gallegos while in custody at the Ventura County jail.
10. Calls made by Christopher Andrade to an inmate in the custody of the Bureau of Prisons
11. Verizon Wireless text message history, call detail records, subscriber information, tower records, cell site information, and search warrant results for phone number (805)914-9191.
12. AT&T call detail records, subscriber information, tower records, cell site information, and pen register and trap and trace results for phone number (805)415-6701.

It should be noted that all exhibits provided may not be introduced at trial during the Government's case-in-chief. The Government anticipates that some of the exhibits listed may not be deemed necessary at time of trial and that some exhibits not listed (but set forth in discovery) may be deemed necessary at time of trial. Therefore, this notice may not include all the items that may be produced at trial, but is a list some of the evidence the Government would submit in

evidence at trial and, thus, is offered in advance per CrLR 55.2 for the purpose of judicial economy and efficiency.

III.

The above described exhibits are available for review by attorneys for defendants, Viola Elizabeth Garcia, Christopher Andrade, and Ronaldo Gallegos.

WHEREFORE, the United States prays that said exhibits are held admissible on grounds that they are what they purport to be, and thus “authenticated” for purposes of trial, should no objection be made in accordance with CrLR 55.2.

Respectfully submitted,

RYAN K. PATRICK  
UNITED STATES ATTORNEY

By: /s/ Roberto Lopez, Jr.  
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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the Government's Offer of Trial Exhibits was on this 17th day of July, 2019 filed by ECF and served on Richard Garcia, Mauro Barreiro, and Rafael De La Garza, attorneys for Defendants, Viola Elizabeth Garcia, Ronaldo Gallegos, and Christopher Andrade.

/s/ Roberto Lopez, Jr.  
ROBERTO LOPEZ, JR.  
Assistant United States Attorney

